

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

Joseph R. Saveri (State Bar No. 130064)
Lisa J. Leebove (State Bar No. 186705)
James G. Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM
505 Montgomery, Suite 625
San Francisco, CA 94111
Telephone: 415.500.6800
Facsimile: 415.500.6803

Co-Lead Counsel for Plaintiff Class

[Additional counsel listed on signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

JOINT DISCOVERY STATUS REPORT

Pursuant to the Court's April 1, 2013 Case Management Order (Dkt. 380), the parties submit this joint discovery status report.

I. Status of Discovery

No depositions have taken place since the April 26, 2013 Joint Discovery Status Report. The deposition of Sheryl Sandberg (formerly of Google) remains outstanding.

1 **II. Salary Range and/or Market Reference Guideline**

2 The parties report the following updates to last week's Joint Discovery Status Report:

3 **Apple:** Plaintiffs and Apple met and conferred further and reached a resolution regarding
4 Plaintiffs' request that Apple confirm the accuracy of tables of Apple job title and job grade data
5 that Plaintiffs have prepared. There are no outstanding issues or discovery disputes to be decided
6 with respect to Apple's production of compensation information.

7 **Intel:** Plaintiffs and Intel met and conferred further and reached a resolution regarding
8 Plaintiffs' request that Intel confirm the accuracy of tables of Intel job title and job grade data that
9 Plaintiffs have prepared. There are no outstanding issues or discovery disputes to be decided with
10 respect to Apple's production of compensation information.

11 **Lucasfilm:** Lucasfilm compiled and produced to Plaintiffs certain information Plaintiffs
12 had requested as contemplated in last week's discovery report. Subject to Lucasfilm's
13 representation about how it maintained its salary range information during the Class Period,
14 Plaintiffs are satisfied and there are no outstanding issues or discovery disputes to be decided with
15 respect to Lucasfilm's production of compensation information.

16 **III. Steve Jobs Apple Town Hall Materials**

17 At Plaintiffs' request, Apple has located and produced video recordings of the Apple town
18 hall meetings for which it previously produced transcripts. There are no outstanding issues or
19 discovery disputes to be decided with respect to this request.

20 **IV. Plaintiffs' Responses To Interrogatories 15 & 16**

21 The parties have met and conferred and have agreed that Plaintiffs will supplement their
22 response to Defendants' Interrogatory No. 15 no later than May 24, 2013, and will provide a
23 substantive response to Defendants' Interrogatory No. 16 no later than June 7, 2013.

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Respectfully submitted,

Dated: May 3, 2013

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

By: /s/ Kelly M. Dermody
Kelly M. Dermody

Richard M. Heimann (State Bar No. 63607)
Kelly M. Dermody (State Bar No. 171716)
Eric B. Fastiff (State Bar No. 182260)
Brendan Glackin (State Bar No. 199643)
Dean Harvey (State Bar No. 250298)
Anne B. Shaver (State Bar No. 255928)
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008

Co-Lead Counsel for Plaintiff Class

Dated: May 3, 2013

JOSEPH SAVERI LAW FIRM

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)
Lisa J. Leebove (State Bar No. 186705)
James G. Dallal (State Bar No. 277826)
JOSEPH SAVERI LAW FIRM
505 Montgomery, Suite 625
San Francisco, CA 94111
Telephone: 415. 500.6800
Facsimile: 415. 500.6803

Co-Lead Counsel for Plaintiff Class

1 Dated: May 3, 2013

O'MELVENY & MYERS LLP

2
3 By: /s/ Michael F. Tubach
Michael F. Tubach

4 George Riley
5 Michael F. Tubach
6 Lisa Chen
7 Christina J. Brown
8 Two Embarcadero Center, 28th Floor
San Francisco, CA 94111
Telephone: (415) 984-8700
Facsimile: (415) 984-8701

9 *Attorneys for Defendant APPLE INC.*

10 Dated: May 3, 2013

KEKER & VAN NEST LLP

11 By: /s/ Daniel Purcell
12 Daniel Purcell

13 John W. Keker
14 Daniel Purcell
15 Eugene M. Page
16 633 Battery Street
San Francisco, CA 94111
Telephone: (415) 381-5400
Facsimile: (415) 397-7188

17 *Attorneys for Defendant LUCASFILM LTD.*

18 Dated: May 3, 2013

JONES DAY

19 By: /s/ David C. Kiernan
20 David C. Kiernan

21 Robert A. Mittelstaedt
22 Craig A. Waldman
23 David C. Kiernan
24 555 California Street, 26th Floor
San Francisco, CA 94104
Telephone: (415) 626-3939
Facsimile: (415) 875-5700

25 *Attorneys for Defendant ADOBE SYSTEMS, INC.*

1 Dated: May 3, 2013

JONES DAY

2
3 By: /s/ Robert A. Mittelstaedt
Robert A. Mittelstaedt

4 Robert A. Mittelstaedt
5 Craig E. Stewart
555 California Street, 26th Floor
6 San Francisco, CA 94104
Telephone: (415) 626-3939
7 Facsimile: (415) 875-5700

8 Catherine T. Zeng
1755 Embarcadero Road
9 Palo Alto, CA 94303
Telephone: (650) 739-3939
10 Facsimile: (650) 739-3900

11 *Attorneys for Defendant INTUIT INC.*

12 Dated: May 3, 2013

MAYER BROWN LLP

13 By: /s/ Lee H. Rubin
14 Lee H. Rubin

15 Lee H. Rubin
Edward D. Johnson
16 Donald M. Falk
Two Palo Alto Square
3000 El Camino Real, Suite 300
17 Palo Alto, CA 94306-2112
Telephone: (650) 331-2057
18 Facsimile: (650) 331-4557

19 *Attorneys for Defendant GOOGLE INC.*

20 Dated: May 3, 2013

BINGHAM McCUTCHEN LLP

21
22 By: /s/ Frank M. Hinman
Frank M. Hinman

23 Donn P. Pickett
24 Frank M. Hinman
Three Embarcadero Center
25 San Francisco, CA 94111
Telephone: (415) 393-2000
26 Facsimile: (415) 383-2286

27 *Attorneys for Defendant INTEL CORPORATION*

1 Dated: May 3, 2013

COVINGTON & BURLING LLP

2
3 By: /s/ Emily Johnson Henn
Emily Johnson Henn

4 Robert T. Haslam, III
5 Emily Johnson Henn
333 Twin Dolphin Drive, Suite 700
6 Redwood City, CA 94065
Telephone: (650) 632-4700

7 *Attorneys for Defendant PIXAR*

8 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence in
9 the filing of this document has been obtained from all signatories.
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